

Friday 30th October 2020

Northern Territory Liquor Commission
71 Smith Street
Darwin NT 0800

Via email: Liquor.Commission@nt.gov.au

Dear Chairperson,

Re: Review of Conditions of Liquor Licences – Barkly Region

Thank you for the notice received 7th October 2020 indicating the Liquor Commission has determined to undertake the previously planned review of the liquor licence condition variations that occurred in the Barkly in June 2018.

We do not support the retention of the measures that were out in place in June 2018 and believe the Liquor Commission should consider rescinding them. Our view is based on the unfair and discriminatory impact on legitimate and bona fide customers and businesses who have been adversely impacted. We are keen to be involved in the review as it progresses, including in any public hearings that the Liquor Commission may hold into the matter.

It is our submission that the Liquor Commission should hold a public hearing where evidence can be put and examined on the measures that were implemented in June 2018. Should the Liquor Commission determine not to hold a public hearing we would appreciate a further opportunity to provide substantive written submission.

In assessing the community impact of the June 2018 variations in accordance with the Liquor Act and CIA Guidelines, we believe the Liquor Commission would be assisted by examining the Pure Alcohol Content wholesale data per venue held by the Northern Territory Government as well as the BDR 'Sale' and 'No Sale' events per venue held by same.

In previous Liquor Commission proceedings that we have been involved in, the commercial sensitivity of this data can be managed through the use of appropriate confidentiality deeds and we would be supportive of a similar approach being adopted in this matter.

In addition to gaining access to the data described above we would also envisage, with the consent of affected licensees, being able to look at commercial material they may be able to bring forward with similar confidentiality arrangements if required.

We would also like the opportunity to review submissions made by proponents of retaining the current arrangements including any health or policing data that is provided.

Our interest includes the likely desire to cross examine on that data and so we would encourage the Liquor Commission to make submitters aware of the possible need to make relevant witnesses available for that purpose in any hearings the Commission is considering.

Thank you for the opportunity to provide this submission.

Sincerely,

A handwritten signature in cursive script that reads "Alex Bruce".

Alex Bruce
Chief Executive Officer